

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

CLINTON STRANGE,

Plaintiff

v.

SHRI HARI GOMARKETIN, LLC,

Defendant

FILED
RICHARD W. HASEL
CLERK OF COURT
2021 SEP 27 PM 4:36
U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

JURY TRIAL DEMANDED

CIVIL ACTION COMPLAINT

PRELIMINARY STATEMENTS:

1. On November 15, 2019, at 12:38pm CST the Plaintiff Clinton Strange appearing *pro se* Clinton Strange asked Defendant Shri Hari GoMarketin LLC (herein “GoMarketin” or “Defendant”) to stop marketing him with offerings of Google, LLC branded products, goods, and or services. Despite being sued by Plaintiff in this U.S. District Court, and also in spite of numerous Better Business Bureau Complaints the Defendant appears to be both unrepentant and undeterred from their illegal activities. Plaintiff seeks relief from this U.S. District Court in the form of both Preliminary and Permanent Injunctive Relief enjoining Defendant from future violations, statutory damages under the Telephone Consumer Protection Act of 1991 (“TCPA”), and other relief together along with an award of costs, fees, expenses, and pre & /or post judgment interest on any judgment.

JURISDICTION & VENUE:

2. **Jurisdiction** primarily arises in this U.S. District Court under a Federal Question as the TCPA is a Federal Statute pursuant to 28 U.S. Code § 1331.
3. **Supplemental Jurisdiction** would be properly applied to the Plaintiff’s State Law Claims to promote Judicial Economy as they arise out of the same set and nucleus of

operative facts as the claims that gave rise to Federal Question Jurisdiction pursuant to 28 U.S. Code § 1367.

4. **Venue** lies proper in this U.S. District because Defendant resides here and is incorporated here. Further, the Plaintiff consents to jurisdiction of this Court pursuant to 28 U.S. Code § 1391.

THE PARTIES:

5. Plaintiff CLINTON STRANGE is a veteran and an adult individual residing at the address of:

CLINTON STRANGE
7021 WINBURN DRIVE
GREENWOOD, LA 71033

6. Defendant SHRI HARI GOMARKETIN LLC is an Ohio Domestic Limited Liability Company. According to the Ohio Secretary of State, this Defendant can be served at the address of:

BHARAT PAREKH
c/o: SHRI HARI GOMARKETIN, LLC
4655 HILTON AVE, APT C
COLUMBUS OH 43228-1845

FACTUAL ALLEGATIONS:

Do-Not-Call Request on November 15, 2019

7. After Plaintiff filed his complaint against Defendant; based on actionable calls arising under State & Federal Statutes in 2019 a Shri Hari GoMarketin agent using the 'desk name' of "Veronica" telephoned the Plaintiff on his Do-Not-Call Registered Cellphone 318-423-5057 from a Caller ID that displayed "000-000-0000" as the Caller ID on November 15, 2019, at 12:38pm CST [See Exhibit A].
8. During the Plaintiff's conversation with 'Veronica' with Shri Hari GoMarketin, he stated he did not want to be marketed anymore [See Exhibit B- *Transcript* at appx. 01:21].

Residential Use of Cellphone

9. Plaintiff Clinton Strange has used his wireless cellphone number 318-423-5057 as a residential primary line since at least January 2018. He uses his cellphone as a cooking timer for making cornbread, rice, and sausage. He uses his cellphone as a bedside alarm clock. He has personally paid for the usage of the Verizon Wireless cellphone from his own personal funds since July 2016 (appx.). Further, the Plaintiff has not had a wired residential landline since he discontinued service with AT&T in about July 2016.
10. Plaintiff, since about December 2017, has utilized his residential cellphone to connect and conference with his U.S. Department of Veterans Affairs Mental & Physical Health Advisors and Physicians through the VA Health App and the VA Cares App.

Unsolicited Sales Calls During 2020

11. Plaintiff received an unwanted autodialed Telemarketing call on his cellphone number 318-423-5057 that introduced an advertisement for Google branded services on behalf of Defendant Shri Hari GoMarketin LLC on August 25, 2020, at 9:13 am CST that utilized a Caller ID manipulated number (spoofed Caller ID) of 862-800-2497 [See Exhibit C].
12. Plaintiff received an unwanted autodialed Telemarketing call on his cellphone number 318-423-5057 that introduced an advertisement for Google branded services on behalf of Defendant Shri Hari GoMarketin LLC on September 4, 2020, at 6:20 pm CST that utilized a Caller ID manipulated number (spoofed Caller ID) of 888-469-6219 [See Exhibit D].
13. Plaintiff discussed that call (as referenced above) with Counsel for Shri Hari GoMarketin LLC, and he stated, "*my client doesn't know anything about that*".
14. On October 26, 2020, at 3:13 pm CST the Plaintiff received an illegal Caller ID spoofed call on his cellphone number 318-423-5057 from Defendant Shri Hari GoMarketin LLC

that displayed as coming from Miami, Florida 305-652-9675. Because Defendant's counsel had previously indicated that their client had nothing to do with the recent volley of illegal calls, the Plaintiff decided to surreptitiously record the conversation- utilizing subterfuge- and allow Defendant Shri Hari GoMarketin LLC's telemarketing agent bill Plaintiff's credit card for \$99.00 to prove it was them calling. Plaintiff recorded and later transcribed the conversation [See Exhibit E].

15. During the above referenced call (which was illegal) the Defendant's agent took the necessary steps to place a pre-recorded voice call without the Plaintiff's consent from Google's service verification network. The number appearing on the Caller ID was 202-455-8888 received October 28, 2020, at 3:18 pm CST [See Exhibit F].

Mitigation of Harm Attempts by Plaintiff

16. Plaintiff Clinton Strange registered his residential wireless cellphone number 318-423-5057 on the Federal Do-Not-Call registry on January 3, 2018, and the registration was confirmed on January 4, 2018 [See Exhibit G].
17. Plaintiff Clinton Strange registered his residential wireless cellphone number 318-423-5057 on the Louisiana Do-Not-Call Program registry on August 2, 2018, and the registration was confirmed on January 4, 2018 [See Exhibit H].
18. Plaintiff Clinton Strange voiced a Do-Not-Call request to desk named agent 'Veronica' with Defendant Shri Hari GoMarketin on November 15, 2019, at 12:38pm CST.
19. Plaintiff sued Defendant Shri Hari GoMarketin in the Southern District of Ohio Federal District Court for similar alleged violations which was answered on February 19, 2020 [See Strange v. Shri Hari GoMarketin LLC No. 2:19-cv-05064-ALM-EPD DE * 5 (Feb. 19, 2020)].

THE COUNTS & CAUSES OF ACTION:

COUNT I:

(Plaintiff v. Defendant)

Willful & Knowing Violations of the TCPA

Subsection (b)

20. Plaintiff incorporates all the foregoing paragraphs as though the same were set forth at length herein.
21. Defendant Shri Hari GoMarketin LLC placed at least 4 (Four) unwanted autodialed calls to the Plaintiff's Verizon Wireless cellphone number 318-423-5057 (in 2020) as below:
- a- August 25, 2020, at 9:13 am CST
 - b- September 4, 2020, at 6:20 pm CST
 - c- October 26, 2020, at 3:13 pm CST
 - d- October 28, 2020, at 3:18 pm CST
22. The foregoing and within complained of calls were made utilizing an automatic telephone dialing system that has, and in fact utilizes, the present capacity to randomly & sequentially generate phone numbers and (later) dial them via their 'storage' device randomly and sequentially. Even if some of those calls did not utilize a 'RSGN', some played pre-recorded voice messages at the beginning of each call.
23. As referenced in the Plaintiff's above complaint the Defendant is directly or alternatively vicariously liable for at least the Four (4) calls that the Plaintiff has detailed herein under 47 U.S. Code § 227(b)(1)(A)(iii).
24. Plaintiff seeks both damages and injunctive relief enjoining Defendant from future violations under the TCPA's trebling statutory provision [See 47 U.S. Code § 227(b)(3)(C), and 47 U.S. Code § 227(b)(3)(B)].

COUNT II:

(Plaintiff v. Defendant)

Willful & Knowing Violations of the TCPA

Subsection (c)

25. Plaintiff incorporates all the foregoing paragraphs as though the same were set forth at length herein.
26. Defendant Shri Hari GoMarketin LLC placed at least (4) unwanted autodialed calls to the Plaintiff's Verizon Wireless cellphone number 318-423-5057 (in 2020) as below:
- a- August 25, 2020, at 9:13 am CST
 - b- September 4, 2020, at 6:20 pm CST
 - c- October 26, 2020, at 3:13 pm CST
 - d- October 28, 2020, at 3:18 pm CST
27. As referenced in the Plaintiff's above complaint the Defendant is directly or alternatively vicariously liable for at least the Four (4) calls that the Plaintiff has detailed herein under 47 U.S. Code § 227(c)(5).
28. Plaintiff seeks both damages and injunctive relief enjoining Defendant from future violations under the TCPA's trebling statutory provision [See 47 U.S. Code § 227(c)(5)(B), and 47 U.S. Code § 227(c)(5)(C)].

COUNT III:

(Plaintiff v. Defendant)

Willful & Knowing Violations of the TCPA

Subsection (d)

29. Plaintiff incorporates all the foregoing paragraphs as though the same were set forth at length herein.

30. Defendant Shri Hari GoMarketin LLC does not maintain a written Do-Not-Call Policy.

Even if they ever did, they do not abide by the written policy as demonstrated above and herein.

31. Based on the foregoing Defendant is liable for damages to Plaintiff Clinton Strange for \$500 under 47 U.S. Code § 227(d) and 47 C.F.R. 64.1200(d).

COUNT IV:

(Plaintiff v. Defendant)

Willful & Knowing Violations of the Louisiana Caller ID Anti-Spoofing Act

32. Plaintiff incorporates all the foregoing paragraphs as though the same were set forth at length herein.

33. Defendant Shri Hari GoMarketin LLC has never placed a call to the Plaintiff's cellphone number 318-423-5057 that displayed a permissible and or accurate Caller ID that would allow a consumer to draw inference that Defendant Shri Hari GoMarketin was the 'caller'.

34. Defendant Shri Hari GoMarketin LLC is liable to the Plaintiff Clinton Strange for not less than Four (4) willful & knowing violations of the Louisiana Caller ID Anti-Spoofing Act codified at Louisiana Revised Statute §51:1741.1 et seq.

35. Defendant Shri Hari GoMarketin LLC is liable to the Plaintiff Clinton Strange for "*up to ten thousand dollars per violation*" pursuant to Louisiana Revised Statute §51:1741.5

PRAYER FOR RELIEF:

~JURY TRIAL DEMANDED UNDER THE 7TH AMENDMENT TO THE U.S. CONSTITUTION~

WHEREFORE, Plaintiff respectfully prays for Judgment in favor of Plaintiff and Damages against Defendant based on the following requested relief:

Statutory Damages;

Trebled Damages;

Stacked Damages;

Actual & Enhanced Civil Damages (under Louisiana Law);

Injunctive Relief Enjoining Defendant from Future Violations;

Costs, Expenses, and Fees associated with Litigating the Action to Judgment;

, and such other and further relief the Court deems necessary, just and proper.

Respectfully Submitted,

X 

Clinton Strange

Pro Se

7021 Winburn Drive

Greenwood, LA 71033

(318) 423-5057

StrangeC982@gmail.com & PARSM LLC@gmail.com

09-20-2021

Dated

INDEX OF EXHIBITS

In Re: *Strange v. Shri Hari GoMarketin LLC*

Exhibit No.	Description of Exhibit	Referenced at ¶
A	November 15, 2019 call from Veronica w/ GoMarketin	7
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C	August 25, 2020 call from 862-800-2497 “Spoofed Call”	11
D	September 4, 2020 call from “GoMarketin” (888) 469-6219	12
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EXHIBIT A



Create contact

Update contact



Jan 30 (Thu) 11:12 AM
00:00:07



Jan 30 (Thu) 9:56 AM
00:00:27



Nov 15, 2019 (Fri) 12:38 PM
00:02:06

EXHIBIT B

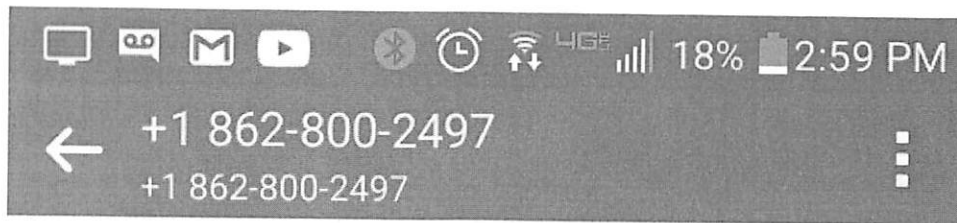
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Veronica:	<u>00:00</u>	Hi Clinton, it's Veronica. I'm calling you in regards of the keywords update. So, do you remember you had paid \$99 for your Google listing?
Clinton Strange:	<u>00:10</u>	Um, yeah. It's... it... I... Is this, uh, [Shri Hari GoMarketing 00:00:13]?
Veronica:	<u>00:13</u>	Uh, yes. So, as you had provided us with some keywords to push your business on first page of Google, so would you like to add some more keywords?
Clinton Strange:	<u>00:27</u>	Um, no. And- and you're gonna wanna take me off your call list, too.
Veronica:	<u>00:35</u>	Okay-
Clinton Strange:	<u>00:35</u>	Um, it- it'd probably be a good idea to go ahead and refund my, um, account.
Veronica:	<u>00:45</u>	Okay, so, like, for that, I can arrange a call back for you from the- the account manager, because I'm not the authorized one to do that for you.
Clinton Strange:	<u>00:53</u>	Okay.
Veronica:	<u>00:54</u>	Okay?
Clinton Strange:	<u>00:55</u>	Um-
Veronica:	<u>00:55</u>	So you just-
Clinton Strange:	<u>00:55</u>	Can-
Veronica:	<u>00:55</u>	Yes, go ahead.
Clinton Strange:	<u>00:59</u>	Can- can- can- can you communicate somethin' to your account manager?
Veronica:	<u>01:05</u>	Yes. So I'll just make a note about it, and he will return your call, okay?
Clinton Strange:	<u>01:10</u>	Okay. He- he, um... I've- I've filed a lawsuit against Shri Hari GoMarketing in, um, Columbus, Ohio-
Veronica:	<u>01:20</u>	Mm-hmm (affirmative).

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Clinton Strange:	<u>01:21</u>	... for, uh, Telephone Consumer Protection Act violations. So I- I don't really know what to tell you to do. I mean, I don't wanna be marketed by y'all anymore. But y'all wanna call me to, um, you know, try to put an end to the lawsuit, that- that's fine, but I don't wanna be marketed anymore.
Veronica:	<u>01:48</u>	Okay, uh, no problem. I'll just arrange a call back for you from my account manager, and she can help you with the rest, okay?
Clinton Strange:	<u>01:52</u>	Okay, thank you. Goodbye.
Veronica:	<u>01:54</u>	Thank you. Yeah. Goodbye. Bye-bye.
Clinton Strange:	<u>02:01</u>	That call was received about 12:39 - 12:40 PM Central Standard Time on 11/15/2019 from, uh, Shri Hari GoMarketing LLC, um, Columbus, Ohio.

EXHIBIT C



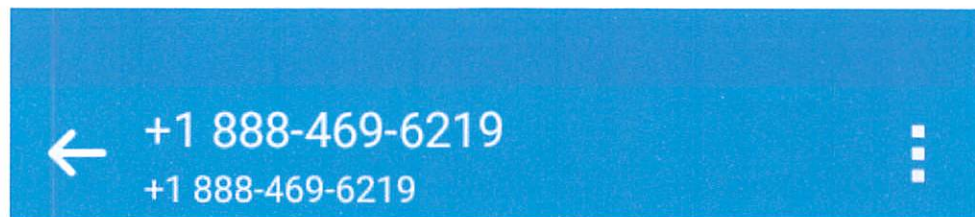
Create contact

Update contact



Aug 25 (Tue) 9:13 AM
00:00:10

EXHIBIT D



Create contact

Update contact

+1 888-469-6219



Sep 4 (Fri) 6:20 PM
00:03:20

From: clint
Sent: Monday, September 7, 2020 5:11 PM
To: Richard Parry
Subject: RE: Strange v. Shri Hari GoMarketin LLC CaseNo.2:19-cv-5064-ALM-EPD (S.D. Oh.)

Dear Richard Parry, Esq.:

In regard to the new claim (regarding the Sept. 4, 2020 call) – would you be willing to:

- Execute and return to me an “emailed” Waiver of Service of Summons (Form AO-399) affording your client 60 days to respond instead of 21 days
- Accept Service of the new complaint via Process Server on behalf of your client
~Or~
- None of the above (in which case I will expend considerable costs to formally serve your client)

Please reply as soon as possible or before September 11, 2020.

Regards,
Clinton Strange

Sent from Mail for Windows 10

From: Richard Parry
Sent: Friday, September 4, 2020 8:18 PM
To: clint
Subject: Re: Strange v. Shri Hari GoMarketin LLC Case No.2:19-cv-5064-ALM-EPD (S.D. Oh.)

Thank you.

Sent from Yahoo Mail for iPhone

On Friday, September 4, 2020, 7:51 PM, clint <bethanysearsguy@yahoo.com> wrote:

Dear Mr. Parry, Esq.:

I am withdrawing the offer to settle as previously tendered via email on 7-9-2020.

Please be advised that at (today) September 4, 2020 at 6:20pm CST , I received a call on my cellphone 318-423-5057 from a number appearing on my caller ID as 1-888-469-6219 and was connected to a Shri Hari GoMarketin LLC agent who attempted to sell me Google Listing services. He advised that I was not already added to the company's

internal Do-Not-Call List, but that he would add me. I advised him that he should inform Bharat Parekh who should in turn contact you regarding the matter.

Regards,

Clinton Strange

Sent from Mail for Windows 10

EXHIBIT E



Create contact

Update contact

+1 305-652-9675



Oct 26 (Mon) 3:13 PM
00:21:19

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Clinton:	<u>00:00</u>	Um, one- one thing before you get too deep into it, um-
Richard:	<u>00:04</u>	Uh-huh.
Clinton:	<u>00:05</u>	Can- my email address that y'all have on file is a little bit different.
Richard:	<u>00:10</u>	Uh-huh.
Clinton:	<u>00:11</u>	It's, um, P-A-R-S-M-L-L-C@gmail. Um, I think you said- said P-A-R-S-A-M-L-L-C@gmail.
Richard:	<u>00:24</u>	Oh. I'm sorry. Well, um-
Clinton:	<u>00:28</u>	Are you able- are- are-
Richard:	<u>00:30</u>	And you mentioned that it's P-A-R-S-M-L-L-C@gmail, correct?
Clinton:	<u>00:35</u>	Yeah. P-A-R-S-M-L-L-C@gmail. And that's probably- that's probably-
Richard:	<u>00:40</u>	Not a problem.
Clinton:	<u>00:41</u>	...why I didn't get the, uh, the email uh, from last- last time back in 19.
Richard:	<u>00:49</u>	2019, uh-huh. That's why. Okay. Not a problem. Now simply what I'll be doing is first I'll go ahead and send you the verification code and get the listing verified. Now this will be a proper cell regenerated code that you will be receiv- receiving in a form of text message, so one you go ahead and receive the code please do not share the code with anyone else as you are the owner, so you are the only authorized person who will be having the access to the verification code. All right?
Clinton:	<u>01:15</u>	Okay.
Richard:	<u>01:15</u>	And also with the code within seven to eight hours you will be receiving a proper cell regenerated email. It will clearly mention that it is a- it is- it will come to you from support@GoMarketin.com all right? So once you go ahead and receive the link you just have to click on the link button. The six digit code number. That will go ahead and give you a proper cell regenerated certificate which will clearly mention that your Google verification- that your Google my business is verified and claimed for the upcoming year that is 2020 2021. So now you

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can go ahead and check your uh, cell phone, Clinton. Have you received the text message?

Clinton: 01:56 Hold on.

Richard: 01:59 So.

Clinton: 02:08 I have not yet.

Richard: 02:12 Oh it's a normal text message. It is not [crosstalk 00:02:15].

Clinton: 02:14 Oh here- here- here we go. Yeah. Here we go. Uh, uh, yes. I got it.

Richard: 02:22 Oh that's perfect. Now as I mentioned to you Clinton, please do not share the code with anyone else and no one from Google will ever ask you for this code as you are the owner so you're the only authorized person.

Clinton: 02:32 Okay.

Richard: 02:34 Talking about that, well Clinton as we are updating the Google map listings your business address it's, uh, last year you had given us an address it's at 7021 Windburn Drive uh, Wetner, Louisiana and it's 71022 correct?

Clinton: 02:48 It's Greenwood.

Richard: 02:51 Greenwood okay. Just a moment.

Clinton: 02:53 Yeah. Everything else is correct though.

Richard: 02:58 That is Greenwood?

Clinton: 03:01 Yep.

Richard: 03:01 That is 7021 Windburn Drive Greenwood, Louisiana 71033?

Clinton: 03:08 That's correct.

Richard: 03:12 Okay that's perfect. So what I'll be doing is I'll be updating this address onto the Google maps. And this will be for 71033 correct?

Clinton: 03:20 Correct.

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Richard:	<u>03:20</u>	Okay. Now, as we're getting the business verification, so as you have received the verification, uh, code now also within- as soon as you hang up the call you will be receiving a call that is from the Washington D.C. that's 202 or you might be receiving it actually on the same call itself. If you receive the call sir, you can answer it, listen to it, I'll hold the line by the time. Can you check your call? Like can you-
Speaker 3:	<u>03:48</u>	Hello. Thank you for using Google phone verification. Remember you should not share this code with anyone else and no one from Google will ever ask for this code.
Richard:	<u>03:59</u>	So are you receiving it?
Clinton:	<u>04:03</u>	Yeah, yeah. I'm- I got it.
Richard:	<u>04:08</u>	Okay that's perfect. So this is a verification code that comes to you directly from the Google services.
Speaker 3:	<u>04:13</u>	Four.
Richard:	<u>04:15</u>	...that code back to you. And also it surely mentions to you it is a Google one verification. Please do not share the code.
Clinton:	<u>04:20</u>	Okay.
Richard:	<u>04:20</u>	Talking about that mentioned in the year of 2019 last year when we had updated the listing we had gone ahead and updated the listing that was, um, updated using one of your MasterCard that was ending with 1892. That is for a one time fee of \$99. That is with an expiration of 12/21. So will you be using the same card for the year of 2020 2021, Clinton, or will that be a different card?
Clinton:	<u>04:46</u>	Um, let me give you a different card.
Richard:	<u>04:49</u>	Not a problem. Go ahead.
Clinton:	<u>04:51</u>	It's MasterCard number 5332 .
Richard:	<u>04:54</u>	Uh-huh.
Clinton:	<u>04:54</u>	4805 .
Richard:	<u>04:54</u>	4805 .
Clinton:	<u>04:55</u>	2493 .

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Richard:	<u>04:57</u>	Uh-huh.
Clinton:	<u>04:59</u>	0135.
Richard:	<u>05:12</u>	Okay and the expiration?
Clinton:	<u>05:20</u>	December of 23.
Richard:	<u>05:26</u>	12/23 all right and the three digits at the back?
Clinton:	<u>05:32</u>	349 .
Richard:	<u>05:32</u>	349 . All right. Now Clinton, this is uh, I'll repeat the card number back again. Uh, you can correct me. Uh that is 8332 4805 2498 0135 correct?
Clinton:	<u>05:50</u>	That's correct.
Richard:	<u>05:52</u>	Perfect. Now, I also as we go ahead and process the request, Clinton, also there will be a possibility that you might receive a notification. There will be a notification from your bank which will clearly mention that it is a \$99 payment. Nothing more than that all right?
Clinton:	<u>06:06</u>	Okay.
Richard:	<u>06:07</u>	And also as soon as we go ahead and process the request you will be receiving a proper cell regenerated notification that will be coming to you from [inaudible 00:06:15] @GoMarketing.com which will clearly mention that it is a \$99 payment that you're making toward your business listing. That is for the se- the Season Appliance Repair SMLLC. Correct?
Clinton:	<u>06:28</u>	That's correct.
Richard:	<u>06:29</u>	Perfect. Now please do not hang up the line, Clinton, I'll be there on the line, okay?
Clinton:	<u>06:35</u>	Okay.
Richard:	<u>06:35</u>	I'll just go ahead and process the payment of \$99 and also provide you with your account I.D. number, so just be on the line for 30 to 40 seconds oh yeah? While I go ahead and process your request.
Clinton:	<u>06:44</u>	Okay. All right.

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Richard:	<u>06:47</u>	All right. I'll be just a moment, Clinton. (silence)
Richard:	<u>06:48</u>	All right. Uh, Mr. Clinton, are you there?
Clinton:	<u>10:12</u>	Yes. Yes I'm- I'm here.
Richard:	<u>10:13</u>	All right. Okay. Mr. Clinton I would like to go ahead and help you out with my contact details as well so can you grab a pen and a paper handy please?
Clinton:	<u>10:22</u>	Uh, yeah. Give me just a second. Okay I'm ready.
Richard:	<u>10:36</u>	All right. Well you can take down my name first. That is uh, Richard.
Clinton:	<u>10:44</u>	Okay.
Richard:	<u>10:47</u>	And you can take down my number. That is 1800.
Clinton:	<u>10:56</u>	Yeah. 1 800. Richard?
Richard:	<u>11:07</u>	657. Yes sir.
Clinton:	<u>11:12</u>	Okay.
Richard:	<u>11:18</u>	9380. Okay I'll repeat the uh, number once again. That is 1 800 657 9380.
Clinton:	<u>11:24</u>	Okay.
Richard:	<u>11:27</u>	And also you can take down your account I.D. number. Are you ready?
Clinton:	<u>11:34</u>	I'm ready.
Richard:	<u>11:37</u>	That will be G as in Google. M as in Mary. 1571341448.
Clinton:	<u>11:51</u>	Okay.
Richard:	<u>11:57</u>	Yeah. So this is uh, your account I.D. number. In future you have any queries, any questions you can certainly give us a call and we will be there to help you out, all right?
Clinton:	<u>12:06</u>	Okay. Hey Rich- Richard?
Richard:	<u>12:08</u>	That's-

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Clinton:	<u>12:08</u>	Um, you're- you're with Go marketing.
Richard:	<u>12:14</u>	Sorry?
Clinton:	<u>12:14</u>	Go Marketing?
Richard:	<u>12:17</u>	Yes that's right.
Clinton:	<u>12:20</u>	And um, do- do you have an address? Or is it just a website?
Richard:	<u>12:28</u>	Sorry?
Clinton:	<u>12:29</u>	Do you have an address or a website?
Richard:	<u>12:35</u>	The address for the website, yes sir. We do have it and also you will see once you go ahead and check for the website it will clearly mention it is a G-O-M-A-R-K-E-T-I-N for that. So it will go ahead and help you out with the update that is all your business details like uh, the keywords and the services. We go ahead and update the Google map listing, all right? So as we are the backing team of Google, we are the ones who work on your keywords and the services. And last year as you have gone ahead and trusted us, that was in the year of 2019 as I mentioned, if you want you can go ahead and reverify. But Clinton that is the reason we go ahead and help you out with your last four digits of your card, so that you can verify that you're speaking to a legit company, not to any other third party company.
Clinton:	<u>13:11</u>	Yeah. And- and- and- and- and- and-
Richard:	<u>13:11</u>	As I mentioned you can check your-
Clinton:	<u>13:15</u>	You had it right. It was 1892 on the other- on the card that I paid last time.
Richard:	<u>13:21</u>	Yeah. That's correct. So that is the reason... what we do is we go ahead and verify the card details so that you can understand that you're speaking to the right person, not to any other third party company.
Clinton:	<u>13:39</u>	Right.
Richard:	<u>13:40</u>	All right?
Clinton:	<u>13:42</u>	I want to make sure I'm speaking to Shri Hari GoMarketin, LLC of Columbus, Ohio. Right.

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Richard:	<u>13:50</u>	Yes, that- that's correct.
Clinton:	<u>13:53</u>	Yeah. Can you tell me when you uh, last called? I think it was about a month or two ago. Can you look back in your records and- and see? 'Cause I think y'all tried to call like in September 20 something? Maybe the 23rd. I can't remember exactly.
Richard:	<u>14:15</u>	September. No sir. Uh, 'cause as of now I see the records. Uh, just give me a moment.
Clinton:	<u>14:24</u>	Okay.
Richard:	<u>14:57</u>	All right where Mr. Clinton, I do believe that you might have received a call in the month of, uh, August. But September we were not here now.
Clinton:	<u>15:05</u>	Au- Au- August- Au- August might have been it.
Richard:	<u>15:07</u>	Not here.
Clinton:	<u>15:08</u>	Uh, do you remember the date?
Richard:	<u>15:12</u>	Sorry?
Clinton:	<u>15:13</u>	Do you remember the date in August? 'Cause I remember it was from an [crosstalk 00:15:18] 866 number I think?
Richard:	<u>15:22</u>	Sorry?
Clinton:	<u>15:23</u>	Yeah the call back in August.
Richard:	<u>15:27</u>	Uh-huh.
Clinton:	<u>15:28</u>	Do you remember the date?
Richard:	<u>15:33</u>	No sir. Uh, as of now I do not have the date. Like the exact date, 'cause uh, I do not see it over here. I can only see that there was a call made to you that was in the month of August.
Clinton:	<u>15:46</u>	Oh, okay.
Richard:	<u>15:49</u>	Yes that's right.
Clinton:	<u>15:54</u>	Have you- have you went ahead and billed my card and sent the email? 'Cause I don't want to tie you up any longer than I have to.

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Richard: 16:03 Oh, okay. Well I am- I am certainly going ahead and doing that. Just give me 30 seconds over here.

Clinton: 16:08 Okay.

Richard: 16:15 Just a second. Just give me a few more minutes over here, Clinton. I'll make it quick as possible, all right?

Clinton: 16:18 Okay.

Richard: 16:18 Just a moment. (silence)

Richard: 16:18 All right, uh, Clinton are you there?

Clinton: 16:18 Okay. Yeah I'm here.

Richard: 18:43 All right. Okay. So Clinton what we have done is we have gone ahead and got the listing verified and updated all right? And also as mentioned there will be a link which will be coming to you so that will be on your email address that is P-R-S-N-L-L-C@gmail.com. All right? So once you go ahead and receive the link you just have to punch in the five digit, six digit code number that you have received onto your text message. It will go ahead and provide you with the proper service innovated certificate which will clearly mention that it is it verified and changed for the upcoming two years, all right?

Clinton: 19:13 Okay. So that- that email address again is P-A-R-S-M-L-L-C.

Richard: 19:17 S-M-L. That's perfect. That's perfect. I've got that email changed as P-A-R-S-M-L-L-C@gmail.com.

Clinton: 19:27 Yes.

Richard: 19:28 All right?

Clinton: 19:28 Yes.

Richard: 19:29 All right. Well thank you very much for your time and patience, Clinton. You have a wonderful day, ma'am. Sir. Sir.

Clinton: 19:35 Okay. Have a good day.

Richard: 19:36 You too. Bye- bye.

Clinton: 19:40 Bye-Bye.

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Richard: 19:40 Bye.

EXHIBIT F



(202) 455-8888

(202) 455-8888



Create contact

Update contact

(202) 455-8888



Oct 26 (Mon) 3:18 PM

00:15:58

EXHIBIT G

From: Verify@donotcall.gov
Sent: Thursday, October 1, 2020 5:09 PM
To: caddobossierrefrigeration@gmail.com
Subject: National Do Not Call Registry - Your Registration Is Confirmed

Thank you for registering your phone number with the National Do Not Call Registry. You successfully registered your phone number ending in 5057 on January 04, 2018. Most telemarketers will be required to stop calling you 31 days from your registration date.

Visit <https://www.donotcall.gov> to register another number or file a complaint against someone violating the Registry.

Please do not reply to this message as it is from an unattended mailbox. Any replies to this email will not be responded to or forwarded. This service is used for outgoing emails only and cannot respond to inquiries.

1/3/2018

National Do Not Call Registry



FEDERAL TRADE COMMISSION



National Do Not Call Registry

En Español

You have registered the following telephone number in the National Do Not Call Registry:

(318) 423-5057

You may print this page if you wish to retain a copy for your records.

[Back to Results | Privacy Policy](#)

EXHIBIT H

Louisiana Public Service Commission



Consumer On-Line Registration Form

I request that the Louisiana Public Service Commission enroll my residential telephone number in the Louisiana "Do Not Call" Program using this on-line form.

Please fill out the form in its entirety. Please list only one First and Last name. Be sure to give a complete phone number, including a valid area code. Note: the form will not be processed if all required fields are not completed or if an incorrect area code is given. For multiple phone numbers, please fill out a separate form for each. (Please register only residential phone numbers).

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First Name: (Only
one first name,
please)

Clinton

(required)

Last Name:

Strange

(required)

Mailing Address:

7021 Winburn Drive

(required)

Apartment
Number:

(required
when
applicable)

City:

Greenwood

(required)

Zip Code:

71033 -

(5 digit
required)

Residential Phone
Number: (include
area code)

(318) 423 - 5057

(required -
must be a
Louisiana
area code)

E-Mail Address:

bethanysearsguy@yahoo.c

(optional)

The information obtained in this registration is not open to public inspection or disclosure as defined in the Commission's General Order dated November 7, 2001. The Louisiana Public Service Commission will take all necessary steps to protect the confidentiality of the information in its database.

You will receive a confirmation screen upon successful transmission of this form.

The Louisiana "Telephone Solicitation Relief Act of 2001" directs the Louisiana Public Service Commission to promulgate regulations and to compile and maintain a "Do Not Call List." The List consists of telephone numbers of residential telephone subscribers who have elected to reduce telephone solicitations. Business numbers may not be included on the list. The law requires the "Do Not Call" Register to be operational by January 1, 2002.

Note: This form does not employ encryption during the transmission phase. The information being sent, although personal, is public domain, and does not include anything sensitive such as drivers license numbers, bank numbers, credit card



numbers or social security numbers. Address and phone information can be obtained from a vast array of sources, including Internet people finders, address database CD-ROMS, white pages, etc.

If you do not feel comfortable sending the information in this way, please print the form, complete it, and send it via standard mail to:

Louisiana Public Service Commission

Louisiana Do Not Call Program

Galvez Building, 12th Floor

602 North Fifth Street

Post Office Box 91154

Baton Rouge, LA 70821-9154

Galvez Building, 12th Floor • 602 North Fifth Street PO Box 91154 • Baton Rouge, LA 70821-9154 • 225-342-

4999 • 800-256-2397 • 225-342-2531 (Fax)

Louisiana Public Service Commission



Registration Confirmation

318-423-5057

Thank You! The "Do Not Call" List is updated quarterly. It will take 30 to 120 days for your number to appear on the list, depending upon the date you register. If you receive a call from a telemarketer after your effective date and wish to file a complaint, you will be required to download and fill out a complaint form. Some specific information is required, but any additional information you provide regarding a complaint can greatly aid our investigation of the violation.

Example of information that you will be requested to provide in a complaint:

- Your Name
- Your Home Phone Number where the Telemarketer called
- Your Parish and Mailing Address
- The Name of the Telemarketing Company and the business they represent
- The Time and Date of the Telemarketer call you received
- The Telemarketer's Phone number (If you have Caller ID or other service, it would be useful to obtain and/or retain the telemarketer's phone number with such a device.)
- The Telemarketer's Business Address
- The Product or Service you were offered

Remember that the Louisiana "Do Not Call" Program is designed to reduce the number of calls you receive from telemarketers. It will not eliminate all telemarketing calls. There are some exemptions. These exemptions generally include calls made:

- In response to an express request of the person called. For purposes of this Order, in the case of property or services advertised and offered to sale directly by the owner or provider thereof, if such advertisement or offer contains the phone number of the owner or provider or its authorized representative, then such advertisement or offer shall be deemed to be an "express request" by the owner or provider for inquiries relating to the sale or purchase of such property or services. This authorization expires six months after the "express request" is granted.
- Primarily in connection with an existing debt or contract, payment or performance of which has not been completed at the time of such call.
- To any person with whom the telephonic solicitor has an existing business relationship, or a prior business relationship that was terminated or lapsed within six (6) months of such call, except by a person or business that conducts automobile sales and does not complete the sales presentation during the telephone solicitation and is made in contemplation of the sales presentation being completed at a later face-to-face meeting between the telephonic solicitor and the person contacted and where the contacted person has previously made purchases from the automobile dealership.
- On behalf of an organization, which has non-profit status under Section 501(c) (3), or (6) of the Internal Revenue Code, unless such organization utilizes the services of a paid professional solicitor, as defined in R.S. 51:1901(6).
- For the purpose of conducting marketing research, public opinion polling, or similar activities that do not involve telephonic solicitation or selling or

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Louisiana.gov
The Official Website of the State of Louisiana



obtaining information that will or may be used for telephonic solicitation or selling.

- Constituting political activity. For the purposes of this Order, calls constituting political activity are defined as calls made for the sole purpose of urging support for or opposition to a political candidate or ballot issue provided that the callers identify themselves; or calls made for the sole purpose of conducting political polls or soliciting the expression of opinions, ideas or votes; or calls made by any newspaper or periodical in the state, which is qualified to be the official journal of the state or any parish, municipality, school board, or other political subdivision, as provided by Chapters 2 and 4 of Title 43 of the Louisiana Revised Statutes of 1950.
- Without completing or attempting to complete a sale, said sale to be completed only after a face-to face meeting between the telephonic solicitor and the person called at the telephonic solicitor's primary place of business or at another location selected by the purchaser. The call must be the result of a referral of the person called to the telephonic solicitor, or be placed to an individual who is personally known to the telephonic solicitor. If placed as a result of a referral, the telephonic solicitor must provide to the person called the name of the person who made the referral. If the person called does not wish to be called after such initial call, then the telephonic solicitor shall not call that person and shall maintain a list of such persons. This exemption shall not apply if directly following the sale the telephonic solicitor attempts to deliver an item or collect payment from the person called or caused another to do so.

Salvez Building, 12th Floor • 607 North Fifth Street PO BOX 91154 • Baton Rouge, LA 70821-9154 • 225-342-

4999 • 800-256-2397 • 225-342-2831 (Fax)